

GEORGE K. CHEBAT (034232)

George@EnaraLaw.com

JOSEPH J. TOBONI (031385)

Joseph@EnaraLaw.com

DANIEL DE JULIO (035854)

Danny@Enaralaw.com

Enara Law PLLC

7631 East Greenway Road, Suite B-2

Scottsdale, Arizona 85260

Telephone: (602) 687-2010

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on
behalf of all others similarly situated;

Plaintiffs,

vs.

Stavatti Aerospace, Ltd, a Minnesota
corporation; Stavatti Aerospace, Ltd, a
Wyoming corporation; Stavatti
Corporation, LTD, a Wyoming
corporation; Stavatti Industries, Ltd, a
Wyoming corporation; Stavatti Niagara,
Ltd., a New York corporation Stavatti
Super Fulcrum, LTD, a Wyoming
corporation; Stavatti Ukraine, a Ukrainian
business entity; Stavatti Ukraine, a
Ukrainian business entity; Stavatti Heavy
Industries Ltd, a Hawaii corporation;
Christopher Beskar and Maja Beskar,
husband and wife; John Simon and Jean
Simon, husband and wife; William Mcewn
and Patricia Mcewen, husband wife; Rudy
Chacon and Jane Doe Chacon, husband
and wife; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: CV-23-00226-PHX-DJH

**PLAINTIFF’S APPLICATION FOR
ENTRY OF DEFAULT AGAINST
DEFENDANTS STAVATTI NIAGARA
LTD; JOHN SIMON AND JEAN SIMON**

Plaintiff Valentino Dimitrov (“Plaintiff”) requests the Clerk of Court enter default

1 against Defendant Stavatti Niagara, Ltd; and John Simon and Jean Simon (husband and
2 wife) (collectively, “Defendants”) pursuant to Fed. R. Civ. P. 55(a).

3 In support of this request, Plaintiff relies on the record in this case and the affidavit
4 submitted as “Exhibit A”.

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6 RESPECTFULLY SUBMITTED this 28th day of March, 2023.

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8 **ENARA LAW, PLLC**

9 By: /s/ George Chebat
10 George Chebat
11 Joseph J. Toboni
12 Daniel de Julio
13 *Attorneys for Plaintiff*
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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of March, 2023, copy of the foregoing was transmitted electronically to the CM/ECF filing system for filing and transmittal along with copies transmitted to all counsel of record via the CM/ECF system.